

JAP:TAD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

12-215M

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a) and
960)

ZENNIERE JAHIRA GUMBS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

John Moloney, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about February 29, 2012, within the Eastern District of New York and elsewhere, the defendant, ZENNIERE JAHIRA GUMBS, did knowingly and intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960.

(Title 21, United States Code, Section 952(a) and 960)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant

1. On or about February 29, 2012 at approximately 6:00 p.m., defendant ZENNIERE JAHIRA GUMBS arrived at John F. Kennedy International Airport in Queens, New York, aboard Jet Blue Flight No. 782, originating from Montego Bay, Jamaica.

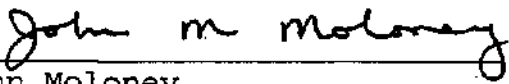
2. A Customs and Border Protection ("CBP") officer approached defendant ZENNIERE JAHIRA GUMBS for an enforcement examination. The defendant was asked if all of the luggage she was carrying and the contents belonged to her, and she replied "yes." The defendant ZENNIERE JAHIRA GUMBS presented two new brown suitcases for inspection.

3. When asked about the purpose of her four-day trip to Jamaica, the defendant initially stated that she went to visit her father, Errol James, who recently had been deported. The defendant later stated that she went to Jamaica for a funeral. While examining the defendant's suitcases, a CBP officer noticed that the bottom of one bag felt thick and spongy. In addition, a strong odor was present. A CBP officer probed the bottom of the bag, revealing a white powdery substance, which field tested positive for cocaine. Defendant ZENNIERE JAHIRA GUMBS was then placed under arrest.

4. The total approximate gross weight of the cocaine found in defendant ZENNIERE JAHIRA GUMBS's suitcase is 1772.6 grams.

facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant ZENNIERE JAHIRA GUMBS be dealt with according to law.



John Moloney
Special Agent
Homeland Security Investigations

Sworn to before me this
1st day of March, 2012

HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK